Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Full Compliance Evaluation Inspection Report

FarWest Fabricators

Moxee, Washington

Inspection Date: May 19, 2022

JOHN PAVITT Digitally signed by JOHN PAVITT Date: 2022.07.26 11:57:03 -08'00'

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Section Chief Signature Date

Derrick Terada
ATES Section Chief
EPA Region 10

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Attachments

1. Basic Facility and Inspection Information

Facility:	Farwest Operating d/b/a FarWest Fabricators Inc
Mailing Address:	7537 Postma Road Moxee, WA 98936
AFS/FRS Number:	110015560882
SIC:	3444 (Sheet Metal Work)
NAICS:	332322 (Sheet Metal Work Manufacturing)
Permit Number:	Yakima Regional Clean Air Agency Most Recent Permit to Construct: NSRP-08-FWO-19
Facility Contacts:	Deborah Dougherty Regulatory Compliance Manager (509) 453-1663 debbie@farwestfabricators.com Scott Smith, CEO (509) 453-1663, Extension 111 Scott.smith@farwestfabricators.com
U.S. EPA Inspectors:	John Pavitt Air and Toxics Enforcement Section (ATES) Enforcement and Compliance Assurance Division (ECAD) U.S. EPA Region 10 222 W 7th Ave, #19, Anchorage, AK 99513 (907) 271-3688 pavitt.john@epa.gov Brendan Whyte ATES, ECAD U.S. EPA Region 10 1200 Sixth Ave. Seattle, WA 98101-3188 (206) 553-1389 whyte.brendan@epa.gov
Date of Inspection:	May 19, 2022
Inspection Start/End Times:	9:35 AM – 2:05 PM

Inspection Notice: This was an unannounced inspection.

This was a multi-media Clean Air Act (CAA) and Emergency Planning and Community Right-to-Know Act Section 313 compliance inspection by the U.S. Environmental Protection Agency (EPA). Inspector Pavitt, EPA Region 10, led the CAA inspection. The Yakima Regional Clean Air Agency (YRCAA) was made aware of the inspection beforehand but was unable to join. The purpose was to identify potential compliance concerns with CAA regulations, specifically to gather information to determine if facility is subject to and in compliance with EPA federal air rule 40 CFR Part 63, Subpart XXXXXX, the National Emissions Standards for Hazardous Air Pollutants, Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (the "Metal Fabrication NESHAP"). This report only covers the CAA inspection.

The facility is a metal fabrication plant located in Moxee, Washington, founded in the mid-1980s. The plant expanded in 2005 to its current 57,000 square-foot operation and manufactures a variety of metal parts. Services include fabrication, machining, powder coating, laser cutting, punching, forming, deburring, stamping, drilling, shearing and rolling metal.[1] During the inspection, EPA inspectors observed products made on-site including metal boxes for Coinstar (coin-cashing machines) and panels for air purifier machines.

YRCAA has issued at least seven New Source Review Air Permits/Orders to the facility, from 2008 through 2019. The permits/orders authorized the installation of various metal fabrication equipment including laser cutters, powder coating booths, parts washing and drying ovens, welding machines, a "Tumbleblast" machine, a sandblaster, batch ovens, deburring machines and screen-printing equipment. The permits require installation and use of associated air pollution control devices including cartridge dust collectors, welding fume extraction devices, a wet collector downdraft table, wet dust collectors and a portable fume extractor. Among other restrictions, the permits/orders prohibit visible emissions as well as fugitive emissions from plant operations. They require compliance with State of Washington regulations, Yakima County regulations and with EPA's Metal Fabrication NESHAP.

At the time of the inspection, YRCAA had posted a public notice regarding a New Source Review application from FarWest Fabricators to install an additional Punch Laser with a Donaldson Torit filter air pollution control, along with an additional Robotic Welder.

The YRCAA permits/orders require the facility to submit an annual *Metal Fabrication Registration* report. The facility's 2021 report identifies metal usage (using mild steel, copper, stainless steel and aluminum). In addition, the report identified welding wire usage (stainless steel, mild steel, nickel alloy, copper and aluminum). The report also details quantities of power coatings and silk screen ink usage. Safety Sheets (SDS) attached to the report identified three different powder coatings, none of which contain cadmium, chromium, lead, nickel or manganese, which are the metal fabrication Hazardous Air Pollutants ("MFHAP") regulated under the Metal Fabrication NESHAP (40 CFR § 63.11522).

[1] See https://www.farwestfabricators.com

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection, a conference call and from a subsequent records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

2. Compliance History

A review of EPA's Enforcement and Compliance History Online (ECHO) database[2] shows no information for CAA compliance activities. EPA inspectors are not aware of any formal or informal CAA enforcement actions at the federal, state or local level at the facility in the last five years.

3. Inspection Elements/Order

a. Pre-Inspection Observations

We went directly to the facility. No observations were made prior to the scheduled inspection.

b. Entry and Opening Conference with Facility Representatives

Inspector Whyte and I arrived at about 9:35 AM on May 19, 2022. We went to the office area and signed in at the front desk. We explained we were inspectors from the EPA and were there for an unannounced CAA and Toxics Release Inventory (TRI) inspections.[3] We were met there by Debbie Dougherty, Regulatory Compliance Manager who escorted us to an office for an entry meeting with her and Scott Smith, CEO. We again showed our credentials and explained we were there for a CAA inspection, specifically checking on compliance with a federal air rule, the Metal Fabrication NESHAP.

Mr. Scott asked that we check back with him at 12 noon, before he had to attend a training with employees. We agreed to meet with him but said if we weren't done with the inspection yet we would continue after meeting back with him.

Inspector Whyte and I gave a summary of the Metal Fabrication NESHAP, which conduct certain activities and use materials with cadmium, chromium, lead, nickel or manganese. I asked for a description of their plant and the work they do.

The facility representatives said they are a sheet metal fabricator; they bend metal, coat it with powder coatings (with an electromagnetic charge) and form it into panels and other products for their customers. They said they are an "OEM" or original equipment manufacturer. They described two of their largest customers as a manufacturer of lifting

[2] See https://echo.epa.gov/

[3] A separate TRI compliance inspection was prepared from this inspection.

equipment and the other as a manufacturer of coin collection machines. Mr. Smith said they were moving in the direction of having more robotics, for example, welding tasks at two stations. He said workers build fixtures and robots weld them.

Inspector Whyte started his TRI inspection and provided a notice of inspection (see footnote 3). He also provided the facility with EPA's Small Business Assistance fact sheet and Confidential Business Information (CBI) Notice.

Inspector Whyte and I said we would ask for records related to CAA and TRI compliance. We said we needed to confirm what their NAICS code was for their operation. The facility representatives said it started with "33…" and they would check for us.

The facility representatives said they've had other environmental inspections. They said inspectors from RCRA (hazardous waste) as well as the stormwater program have been to the plant.

We discussed health and safety at the plant. The facility representatives said personal protective equipment (PPE) at the plant was safety glasses and ear plugs. Inspectors Pavitt and Whyte had this PPE in their car and stepped outside to the parking lot to get it, plus a high-visibility vest.

The opening conference concluded at about 10:15 AM.

c. Facility Walk-Through

The inspection team was escorted by Debbie Dougherty and Ramone Cardenas, Shop Foreman, during the facility walkthrough.

The inspection included a thorough walkthrough of the facility, interviewing operators and taking photographs/videos.

The walkthrough began at 10:23 AM. A digital photo log is Attachment 1 to this report. The plant was operating throughout our inspection.

<u>Shipping Department, Finished Products and Raw Metal Parts</u>

We viewed finished products stacked and ready for shipment. Some products were boxed and placed on pallets, wrapped in clear plastic. A variety of small, stamped metal products were sorted into numbered bins and ready for their regular customers when an order comes in. Some larger sheet metal products, cut and stamped, flat or formed into brackets and boxes were also stacked on shelving, ready to ship when orders came in. Mr. Cardenas said that most of the parts were kept on hand for their main customers and, in fact, they are under contract to keep spare parts on hand. He said most parts were made of mild steel. Stainless steel makes up only about 5% of their products, he said. Copper products are "discrete orders," depending on customers.

Metal Fabrication Machines

We walked through the machining operations and watched the work in progress. Workstations included:

- turret punches,
- lasers,
- press brakes,
- stamping presses,
- robot welding with MIG welding,
- hardware insertion,
- grinding with hand tools, and
- metal brushing with rotating brushes,
- computer numerical control (CNC) mills.

Metal waste from the operations was collected for recycling (Ms. Dougherty said the metal is valuable and it goes to Pacific Recycling). Fumes and dusts were collected in control devices such as cartridge-style dust collectors, fume extractors, tables with downdraft through a water bath. Ms. Dougherty said they did a bioassay of the filtered water and it was non-hazardous waste. We opened several of the dust collection devices and saw the interior had a fine grain dust inside.

The floors and workstations were generally clean and free of accumulated dust.

Gases were stored together. We saw tanks labeled as containing: Argon, Helium, CO_2, Hydrogen, and O_2.

Check-In with Scott Smith, CEO

At 11:25 we met with Mr. Smith and Ms. Dougherty to share information with them about the inspection. Mr. Smith would be leaving at 12 noon so it was our last chance to speak with him that day.

Regarding CAA compliance, I said that I was seeing that their plant was neat and clean, dusts were being collected by control devices and I was not seeing fugitive dust inside the building. We said our work was not done yet and said we would be asking for records after touring the plant.

The facility representatives said they follow the ISO 9001 quality management system.

We resumed our tour at 11:43 AM. We saw more machining operations: turret punch + laser cutting combination equipment which was connected to a cartridge filter box. The waste bin at this station had all steel. Some of the waste was granular in size. We saw an example of a metal plate with punch-outs and laser cutting at this station. Later, we viewed a galvanized steel workstation where a worker was filing-down metal plates to remove rough edges. We also viewed a fiber optic laser cutter that was noticeably faster than other lasers in the shop. As we had seen consistently across the shop, fumes were collected and sent to an air filtration unit with cartridges. The pressure gauge on the filter showed a pressure drop of 7.9 – 8.1 inches of H_2O.

One exception to the air filtration efficiency was found at Laser 02. At this station, we saw a brown powder on the floor and on the exterior side of the cabinet, indicating dust was escaping the control device.

We saw a package of welding rods (1 box).

Powder Coating Operations

One of two powder coating operations was running during the inspection. Workers washed, dried, coated and cured metal panels that moved along on hooks, on a chain. The metal plates had an electrostatic charge and the spray gun had an opposite charge, Ms. Dougherty said.

The air from the coating operation was controlled with air filtration (both incoming and outgoing). Workers coating metal parts wore respirators and full body Tyvek suits. Ms. Dougherty said water from washing is filtered using reverse osmosis and returned to a water tank for reuse. Used water that can't be used again is placed into shipping totes outside.

The curing oven was monitored for temperature in at least two locations. Temperatures were 348°F and 405°F at the time of the inspection. The ovens are heated with natural gas, Ms. Dougherty said, and the combustion exhaust goes to a roof stack. Air filtration inside the powder coating spray booth had a pulse jet, which caused the collected resin powder to fall to the floor inside the booth. Air leaving the booth is filtered a second time, she said. A monitor on the booth showed a pressure drop across the yellow, exterior air filters of 7 inches H_2O. The pulse jet, with cartridge filters, had a pressure of 95 psi, which dropped to 85 psi on each pulse cycle. As the coated panels emerged from the spray booth I did not notice a smell of volatiles and saw no drips to the floor.

We viewed a second powder coating line which was not operating. Designed for batch loads, it had product wash, dry, coat and cure stations similar to the first station we viewed. Ms. Dougherty said resin powder waste from both powder coating lines is placed into drums and heated before pickup for disposal. She said the heated waste melted and formed "hockey puck" type waste. She said this material is classified as a "special waste" which is non-hazardous.

Outdoor Area, Waste Collection and Recycling

We stepped outside to the back of the building. Gases stored outside were canisters of oxygen and a liquid nitrogen spherical shaped tank. A "Power Core" dust collector for all welding stations was running. I saw no fugitive dust coming from this filter.

We also saw a tote, which Ms. Dougherty said held wastewater from the powder coating line wash. She said contractor Safety Clean takes this material. I noted that the hose which discharges into the tote had a visible gap, which could allow evaporation. However, no odors were noticeable in this area.

We saw at least four large, orange, roll-off containers belonging to Pacific Steel. Inside the containers were metal plates that had been cut.

We looked up at the stacks for the oven and dryer that were operating, and the exhaust was clear (no visible emissions).

We viewed additional outdoor storage. Metal scrap and shavings were in a variety of containers. The storage area was clean, without spillage on the ground.

Assembly Area
We walked into the product assembly room, where we saw numerous Coinstar metal boxes on pallets. They were in various stages of being assembled and packaged for shipment.

Additional Storage, Upper Level
Our last stop on the plant tour was a product storage area, where various machined, bent, drilled metal products were on shelves. Some were made of copper, and some were stainless steel.

The walkthrough ended at 4:15 PM.

d. Closing Conference

At 1:25 PM., we sat down in a conference room with Ms. Dougherty to discuss the inspection and conduct the closing conference. I led the closing conference for CAA compliance and summarized the parts of the facility we had visited during the inspection and our observations related to CAA. Inspector Whyte led the TRI compliance areas for discussion.

I went through my inspection notes and described potential compliance concerns from the inspection. The following were identified as potential compliance concerns during the closing conference:

1. During the tour, we saw one baghouse for Laser 02, that had brown dust on the floor and on the outside cabinet walls. The unit needs repair to control the dust leak. The access hatch appeared to be loosely closed and needs to be secured.
2. I said my observation from our inspection is that the plant does metal fabrication activities described in the rule. There are five activities described, and they do at least the following: dry grinding, dry machining, welding, and spray painting. Ms. Dougherty said they do dry blasting at the CNC Area, which is another activity covered by the rule. However, I would need more information to evaluate compliance with the Metal Fabrication NESHAP. I said the rule applies to metal fabrication processes that use MFHAP (cadmium, chromium, lead, nickel or manganese).

- I requested the SDS for all paints (powder coatings) used in the last two years.
- I also requested a list of all materials they are using at the plant that contain the MFHAP.
- I asked for confirmation of their NAICS Code.

I said that if those records indicate they are not subject, then I would not be requesting more records.

I gave Ms. Dougherty a copy of EPA's compliance assistance brochure for subpart 6X. I asked if she had any questions for us. She did not have any questions at that time.

I explained that the inspection would not be complete until I have reviewed all the records requested and the inspection report was written. Inspector Whyte and I departed the facility at 2:05 PM.

4. Post-Inspection Activities

On 5/20/22, Ms. Dougherty sent me an email, stating that she confirmed their NAICS Code is 332322 – Sheet Metal Work Manufacturing, and SIC Code is 3444 – Sheet Metal Work (Attachment 2).

On 6/1/22, Ms. Dougherty sent me an email, attaching a list of vendors and materials containing MFHAP that I had requested. (Attachment 3)

5. Records Review

The facility's list of vendors and materials containing MFHAP was reviewed for this inspection. The list identifies dozens of materials that contain cadmium, chromium, lead, nickel or manganese. The Metal Fabrication NESHAP applies to area sources of HAP where the primary activity of the facility is in one of the following nine source categories (§ 63.11514(a)):

(1) Electrical and Electronic Equipment Finishing Operations;
(2) Fabricated Metal Products;
(3) Fabricated Plate Work (Boiler Shops).
(4) Fabricated Structural Metal Manufacturing;
(5) Heating Equipment, except Electric;
(6) Industrial Machinery and Equipment Finishing Operations;
(7) Iron and Steel Forging;
(8) Primary Metal Products Manufacturing; and
(9) Valves and Pipe Fittings

The inspection showed that the facility has one of these activities: producing fabricated metal products.

The materials list and inspection observations show that facility uses materials that contain or have the potential to emit MFHAP. (§ 63.11514(b)).

Further, the facility has source activities listed and defined in § 63.11514(b) which are subject to the rule:

- Dry abrasive blasting;
- Machining;
- Dry grinding;
- Welding

EPA's Office of Air Quality Planning and Standards published a compliance assistance brochure, "Summary of Regulations Controlling Air Emissions for Nine Metal Fabrication and Finishing Source Categories (August 2008), attached to this report (Attachment 4). The guide recommends that sources "crosscheck your SIC/NAICS codes with the SIC/NAICS codes that

are subject to this rule and listed at" an EPA web site which no longer exists. A check of EPA web sites shows this web site now is located at the following link: Metal Fabrication and Finishing Source Categories: National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards | US EPA The facility's NAICS/SIC do not match those on the list. However, the brochure's reference to NAICS/SIC codes has not been incorporated in the rule itself, even though the brochure was finalized published some 14 years ago.[4] According to the guide, "This brochure is a general guide only; review the rule for your specific requirements…"

[4] NAICS and SIC codes do not appear in the text of 40 CFR Part 63, Subpart XXXXXX, as of the July 2021 published edition, Code of Federal Regulations.